

FILED  
RICHARD W. HAGEL  
CLERK OF COURT

3:19 mj 189

AFFIDAVIT

1 2019 APR -8 PM 2:20

3 U.S. DISTRICT COURT  
4 SOUTHERN DISTRICT OF OHIO  
5 WRIGHT-PATTERSON AIR FORCE BASE

**INTRODUCTION AND AGENT BACKGROUND**

6 I, Frederick J. Seitz IV, after being first duly sworn upon oath, depose and state:

7 I am a Special Agent, United States Air Force Office of Special Investigations (AFOSI) 10th  
8 Field Investigations Squadron (FIS), Wright-Patterson AFB (WPAFB), OH, after being duly sworn,  
9 declare as follows: I am a Special Agent currently assigned to AFOSI 10 FIS. I have been an accredited  
10 Federal Agent for AFOSI since Jan of 2017. I received training to be a Federal Agent at the Criminal  
11 Investigator Training Program at the Federal Law Enforcement Training Center (FLETC), Glynco, GA,  
12 with further training at the United States Air Force Special Investigations Academy also at Glynco, GA.  
13 During the 20-week course, I studied topics such as criminal law, the 4th Amendment, search and seizure,  
14 surveillance, interrogations, arrest techniques and defensive tactics. Additionally, I completed training at  
15 the Crime Scene Investigator Training Program at FLETC, Glynco, GA, in Aug 2018 and Digital  
16 Evidence Acquisitions Specialist Training Program at FLETC, Glynco, GA, in Mar 2019. Prior to  
17 becoming a Federal Agent, I was a Security Forces Investigator for the 355<sup>th</sup> Security Forces Squadron  
(SFS), Davis-Monthan AFB, AZ and the 90th SFS, F.E. Warren AFB, WY, for five years.

18 Along with other agents and investigators, I am conducting an investigation into the violation of  
19 the following federal offenses described in Attachment C, which are believed to have been committed by  
20 JAMES R. GORD (herein after GORD); Male Born: 29 Apr 64; Ohio; DR4; SSN: 293-50-3215; Air Force  
21 Research Laboratory, Hypersonics Directorate, Wright-Patterson AFB, OH.

22 I have reason to believe particular digital devices and related storage devices may contain  
23 evidence identifying paper records, receipts, electronic records, and possible witness(es) to the crimes  
24 outlined below, and further described in Attachment C.

25 Based on my training and experience and the facts set forth in this Affidavit, there is probable  
26 cause to believe violations of the following federal statutes may have been committed by GORD: 18 USC  
27 1384, Prostitution Near Military and Naval Establishments, 18 USC 287, False, Fictitious or Fraudulent  
28 Claims, 18 USC 641, Embezzlement/Misuse of Government Property, 18 USC 1001, False Statements,  
29 18 USC 872, Extortion of Officers or Employees of the United States, 18 USC Sec 7 & 13 which  
30 assimilate ORC 2927.12, Ethnic Intimidation and ORC 2903.21, Aggravated Menacing.

31 This Affidavit does not contain every fact known to the investigation, but only those deemed  
32 necessary to demonstrate sufficient probable cause to support the issuance of the requested search  
33 warrant.

34 As part of the investigation, I have reviewed documentation; electronic records and reports  
35 provided by and discussed information with other agents and investigators involved in the investigation.  
36 For purposes of this Affidavit, I have not distinguished between information of which I have direct  
37 knowledge and that of which I have hearsay knowledge.

38 **JURISDICTION**

39 This Court has jurisdiction to issue the requested warrant because it is "a court of competent  
40 jurisdiction" as defined by 18 U.S.C. § 2711. Specifically, this Court is a district court (including a  
41 magistrate judge) of the United States which has jurisdiction over the offense being investigated. 18  
42 U.S.C. § 2711(3)(A)(i).

46

47

48 **STATEMENT OF PROBABLE CAUSE**49 **BACKGROUND OF INVESTIGATION**

50 This investigation was initiated on 21 March 19 based upon information provided by Civ (Dr)  
 51 SUKESH ROY (herein after ROY), Defense Contractor, Spectral Energies, Dayton, OH that GORD  
 52 engaging in unethical government contract negotiations, communicated threats of violence, and was  
 53 regularly soliciting prostitution.

54 On 15 March 19, SA MATTHEW BLOCKER and SA ROBERT KRING, AFOSI 10 FIS,  
 55 WPAFB, OH interviewed ROY at AFOSI 10 FIS. ROY provided a signed, sworn statement and verbally  
 56 relayed the following information: ROY was the owner and operator of a private company called,  
 57 Spectral Energies, which provided unclassified contract laser imaging of turbine engines to the U.S.  
 58 Government. GORD was a senior research scientist at Air Force Research Laboratory (AFRL)/RQ where  
 59 ROY knew GORD for approximately 17 years. The two men had a professional relationship through  
 60 their common scientific interests and research on behalf of AFRL as a program manager. Through this  
 61 relationship, ROY and GORD grew close and became friends. In 2017, GORD lost his father to suicide  
 62 and experienced severe depression as a result.

63 In October 17, ROY shared with GORD he was looking to hire an administrative technician at  
 64 Spectral Energies. GORD explained he recently met a young professional while on a flight to  
 65 Washington, DC. GORD went on to say he sat next to Civ AMANDA SAVINO, Defense Contractor,  
 66 (Currently of) Innovative Scientific Solutions Incorporated (ISSI), Dayton, OH on the plane and was very  
 67 impressed with how she presented herself. GORD believed SAVINO would be a good fit for ROY's  
 68 company and provided ROY a copy of SAVINO's resume (Exhibit 2). GORD highly encouraged him to  
 69 hire her, speaking favorably of SAVINO's technical expertise. He then finished by stating, "she's also  
 70 really hot." At that time, ROY did not think anything of this comment and agreed to interview SAVINO  
 71 for the position. After reviewing the resume and interviewing SAVINO, ROY hired her into the  
 72 administrative technician position at Spectral Energies, effective November 17.

73 Over the next few months, ROY grew frustrated with SAVINO's lack of capability in the  
 74 position. She was not timely with her suspenses, did not fully understand how to use basic word  
 75 processing and document creation software, and struggled to formulate coherent interoffice emails.  
 76 Additionally, ROY rarely saw SAVINO at her desk, located in Building 5, Area B, WPAFB, OH even  
 77 though her timecard indicated she spent eight hours at work on any given day. When ROY confronted  
 78 SAVINO about this she replied she had been teleworking. ROY explained to her the company telework  
 79 policy and how she was not properly documenting her time away. Independent of this, several of ROY's  
 80 employees expressed concern about the amount of time GORD and SAVINO were spending together in  
 81 the office during each day. Their interactions were often behind closed doors and made the staff  
 82 extremely uncomfortable as there was a perception that GORD and SAVINO were having an intimate  
 83 relationship.

84 At the end of December 17, GORD asked to speak with ROY about SAVINO. As such, ROY  
 85 decided he would share with GORD his issues with SAVINO's poor work performance and the  
 86 perception the staff had of GORD's relationship with her. During this conversation, GORD disclosed to  
 87 ROY that SAVINO was a prostitute he met in Cincinnati, OH. GORD went on to explain he kept a  
 88 spreadsheet on his government issued laptop of prostitutes in various cities around the U.S. When he

89 traveled on behalf of the U.S. Government, he met with these women for various sexual exchanges.  
 90 GORD, who was married to Civ RENEE GORD, 3877 Fernwall Drive, Beavercreek, OH, did not want  
 91 his wife or children to know about his relationships with these women. As such, he would take out cash  
 92 advances against his government travel card (GTC) to pay these women so that the family finances were  
 93 not visibly affected.

94 GORD relayed he met with SAVINO on several occasions and paid her \$400 dollars an hour for  
 95 various sexual acts. Through this regular engagement, GORD eventually fell in love with SAVINO. He  
 96 expressed his true feelings for her and SAVINO responded she felt the same for him. The two  
 97 communicated via GORD's government issued iPhone where he routinely received sexually explicit text  
 98 messages and images from SAVINO. GORD went on to explain that when they began their relationship,  
 99 he was aware SAVINO had several other male clients. She once shared with GORD that one of these  
 100 clients was an employee at the National Air and Space Intelligence Center (NASIC), WPAFB, OH. He  
 101 paid SAVINO approximately \$20K per year to clean his residence in the nude and then perform oral sex  
 102 on him.

103 GORD asked SAVINO to make him her exclusive client. She agreed to stop seeing other men if  
 104 GORD would get her a position with WPAFB which was why GORD gave ROY her resume and  
 105 recommended her for a position. However in December 17, GORD followed SAVINO without her  
 106 knowledge and learned she was still meeting with male clients, despite their arrangement. GORD was  
 107 distressed by this as he was in love with SAVINO.

108 GORD also shared he brought SAVINO with him when he attended a research collaboration  
 109 meeting at Purdue University with Civ (Dr) TERRENCE MEYER, Professor of Mechanical Engineering,  
 110 School of Engineering, Purdue, University, IN. While SAVINO did not attend the meeting, she stayed  
 111 with GORD in West Lafayette, IN and invited her "friend" to come and visit while GORD was working.  
 112 GORD did not know anything about the friend other than he was an Irish-national residing in Vancouver,  
 113 Canada. Upon returning to the hotel room, GORD heard SAVINO and this male companion engaged in a  
 114 verbal altercation. GORD had to mediate the conversation to calm both parties down. After some  
 115 reflection, GORD believed this man might have been another romantic partner of SAVINO's.

116 GORD again expressed concern to ROY that he was losing SAVINO's interest and asked for  
 117 ROY's help to improve his romantic relationship. GORD suggested ROY involve SAVINO more with  
 118 Spectral Energies technical research and asked for her name be included in future "white paper"  
 119 publications (Agent Note: A "white paper" is an unclassified publication released on open source  
 120 channels which outlined research efforts or discoveries). GORD then asked ROY to ensure SAVINO was  
 121 the Spectral Energies representative on any AFRL/RQ temporary duties (TDY) out of the greater Dayton,  
 122 OH area. ROY refused both requests citing SAVINO's position with the company as an administrative  
 123 technician and her not being a technical expert in their field. ROY further outlined his ethical concerns  
 124 surrounding GORD's romantic relationship with SAVINO and asked him to cease all contact with her.  
 125 This angered GORD but ultimately ended the discussion about SAVINO traveling TDY or being  
 126 published as a coauthor. Shortly thereafter, ROY issued a company-wide policy that no member of the  
 127 team was allowed to be behind a closed door alone with SAVINO.

128 After learning about the true nature of GORD's relationship with SAVINO and based on her poor  
 129 work performance, ROY met with his attorney to discuss her termination from the company. ROY was  
 130 advised to wait until SAVINO's one year review in November 18 to release her from Spectral Energies as  
 131 this limited the company's potential liability. ROY agreed and shortly thereafter shared his decision to  
 132 terminate SAVINO's employment with GORD. GORD was frustrated with ROY's decision and urged  
 133 him to reconsider. ROY declined explaining beyond being uncomfortable with employing GORD's  
 134 mistress, SAVINO was not performing in her duties. In Apr 18, GORD notified ROY that SAVINO filed

135 a sexual harassment suit against ROY for instituting the “no closed door policy” and restricting her TDY  
 136 travel with GORD. ROY confronted SAVINO about this suit and she told him she felt discriminated  
 137 against for being a female and felt that ROY was not a good boss. In May 18, GORD was scheduled to  
 138 attend a collaboration meeting in Washington, DC with the Defense Threat Reduction Agency (DTRA)  
 139 but he failed to attend. When ROY learned of this he confronted GORD who explained he was too  
 140 distressed to attend the meeting because SAVINO was withholding sex from him. Additionally his wife,  
 141 R. GORD, asked GORD directly if he was having an affair with SAVINO. GORD lied to R. GORD and  
 142 said they were just friends and that the platonic relationship with SAVINO helped him cope with his  
 143 mental health issues. GORD went on to say ROY was the only person with whom GORD confided all  
 144 these details of his personal life. If anyone ever learned about the true nature of his relationship with  
 145 SAVINO, GORD would know ROY was the one who leaked this information. GORD’s response to this  
 146 would be to come to Building 5 with one of his many guns to, “end it all.” ROY perceived this to mean  
 147 GORD would kill ROY and then himself. In response, he carefully and respectfully asked GORD to limit  
 148 all future personal communication regarding SAVINO with ROY. GORD agreed and reminded ROY to  
 149 keep quiet about everything. He then reminded ROY he was a senior research scientist at AFRL, and that  
 150 as ROY was a Bangladeshi immigrant and the, “old boys club” at AFRL would not believe a word of this  
 151 about someone as well respected as GORD.

152 In Oct 18, approximately two weeks before her one year review, SAVINO told ROY she was  
 153 resigning from Spectral Energies. ROY was confident GORD told SAVINO she would be let go but did  
 154 not press the issue as SAVINO was leaving the company. Shortly thereafter, ROY learned SAVINO was  
 155 hired as an administrative technician at ROY’s competitor company, ISSI, that she was being cited as a  
 156 technical research assistant on a pending ISSI publication, and was traveling with GORD to various  
 157 scientific conferences.

158 It was around this same time Spectral Energies was due to receive a \$250K research grant from  
 159 AFRL. But upon delivery of the funds, Spectral Energies only received \$100K. ROY inquired with the  
 160 WPAFB Contracting Office and was informed GORD split the contract between Spectral Energies and  
 161 ISSI with the remaining \$150K going to ISSI. ROY was confident GORD made this decision because  
 162 ISSI agreed to hire SAVINO. It was around this same time ROY heard through Civ MEL ROCKMORE,  
 163 that GORD recently told him if ROY did not start, “playing nice” and including SAVINO on their  
 164 research, AFRL/RQ would be transferring their research contracts to ISSI.

165 Over the next few months, several colleagues shared with ROY that GORD was introducing  
 166 SAVINO around professional circles as a research assistant. He even had SAVINO chairing a scientific  
 167 panel at an upcoming Research and Applications of Photonics in Defense (RAPID) conference as a  
 168 technical expert. During this time, a colleague informed ROY that the owner of ISSI, Civ (Dr) JOHN  
 169 HOKE, ISSI, Dayton, OH was surprised ROY allowed SAVINO to leave Spectral Energies considering  
 170 how important she was to GORD. ROY learned GORD was overheard telling several senior AFRL  
 171 leaders they should consider avoiding future research opportunities with Spectral Energies and focus their  
 172 contract work towards ISSI. ROY was also aware GORD recently applied for a promotion to a position  
 173 at the Arnold Engineering Development Center (AEDC), Arnold AFB, TN and believed if GORD were  
 174 selected he would ensure SAVINO was hired into a civil service position and received a security  
 175 clearance.

176 In late 2018, several Spectral Energies employees came to ROY with their concerns. By March  
 177 19, four of his 32 employees gave ROY six memorandums for record (MFR) outlining various issues  
 178 regarding GORD’s unprofessional conduct. These letters detailed GORD physically threatening people,  
 179 presenting SAVINO as a “research scientist,” making racially disparaging remarks towards an ethnic  
 180 Chinese employee, and shouting in anger in the workplace. GORD became known for his violent verbal  
 181 outbursts around the office and was routinely heard suggesting he should bring a gun into Building 5 and

182 start shooting. ROY fielded these concerns from his employees but out of fear for his safety and the  
 183 safety of his family, ROY did not elevate any issues with GORD to anyone at AFRL. In March 19,  
 184 several employees told ROY they no longer felt safe coming to work or being around GORD. GORD's  
 185 outbursts and comments about bringing a gun to work had ROY's employees fearful for their lives. On  
 186 multiple occasions in their relationship, GORD told ROY he was an avid gun owner and had a concealed  
 187 carry weapons permit (CCW).

188 From 18-19 March 19, SA KRING coordinated with Civ DENNIS REED, Security Manager,  
 189 AFRL/RQ, WPAFB, OH to collect information on the U.S. Government equipment signed out to GORD.  
 190 According to a spreadsheet collected by REED, GORD was assigned a laptop, a Defense Research and  
 191 Engineering Network (DREN) desktop computer, an iPhone, three external hard drives, and 19 standalone  
 192 laboratory computers. Additionally, REED provided SA KRING with GORD's Air Force Form 4433 –  
 193 U.S. Air Force Unclassified Wireless Mobile Device User Agreement, DD Form 2875 - System  
 194 Authorization Access Request, and screen capture of the consent banner for the DREN system.

195 On 21 March 19, at approximately 1320 hours, SA KRING, SA MORENO, SA  
 196 BRINTZENHOFF, SA CODY FACEMIRE, and SA GREGORY TECHTMAN, AFOSI 10 FIS,  
 197 WPAFB, OH, searched GORD's office for the additional U.S. Government equipment. During the search,  
 198 AFOSI 10 FIS agents seized GORD's laptop, DREN desktop computer, and two external hard drives  
 199 located on top of GORD's desk. All items were located in plain view, within the office.

200 Prior to departing the office, GORD requested to retrieve his personal items from his desk.  
 201 AFOSI 10 FIS agents complied with GORD's request, but prior to letting him enter his office, AFOSI 10  
 202 FIS agents did a safety sweep to ensure GORD did not have access to any weapons. During the safety  
 203 sweep, AFOSI 10 FIS agents were unable to enter one locked door in GORD's filing cabinet. AFOSI 10  
 204 FIS agents stood in front of the filing cabinet while GORD retrieved his personal items. GORD was  
 205 placed on administrative leave and GORD's common access card was seized by AFRL/RQ security.  
 206 GORD was subsequently escorted off of WPAFB by AFOSI 10 FIS and 88th Security Forces Squadron  
 207 (SFS) personnel.

208 On 29 March 19, SA SEITZ conducted a preview on a forensic image of GORD's issued work  
 209 laptop. The preview identified several documents on GORD's laptop related to this investigation. A  
 210 word document on GORD's laptop hard drive titled "Amanda". "Amanda" appeared to be a word  
 211 document GORD typed to SAVINO in black after a disagreement. SAVINO appears to respond  
 212 throughout the document in red. The document contains multiple references to SAVINO's past as a "call  
 213 girl." The properties of this document show it was created by GORD on 12 Oct 2018 at 1951 hours and  
 214 last saved by GORD on 12 Oct 2018 at 2249 hours. A word document on GORD's laptop hard drive  
 215 titled "Amanda Savino Resume April 2018". The document showed a resume for SAVINO and the  
 216 properties of the document showed it was authored by JEFFERY GORD, created on 17 Oct 2017 at 1433  
 217 hours and last saved 19 Apr 2018 at 1652 hours. Numerous excel spreadsheets were located on the laptop  
 218 showing GORD kept meticulous records of trips, funds and account information regularly. In addition to  
 219 his record keeping, several documents were identified as counseling for "AFS". "AFS" being SAVINO's  
 220 initials seem to be GORD and SAVINO communicating with each other in each document. This being a  
 221 method of communicating without electronically sending a document to another location. GORD was  
 222 using his government owned laptop to make these communications.

223 On 1 April 19, SA BLOCKER contacted the University of Tennessee, Knoxville, the University  
 224 of South Florida, and the Ohio Department of Public Safety to verify SAVINO's attendance and  
 225 graduation from each of these academic institutes. None of the aforementioned organizations had any  
 226 record of SAVINO as a student or graduate.  
 227

228

INFORMATION ON DIGITAL STORAGE DEVICES

229 I know from my training and experience that virtually every person, home, business, and vehicle  
 230 are extremely likely to use, possess and/or contain digital media devices and related digital storage  
 231 devices. I also know that these devices can be used to delete, create, share, and store files and other data  
 232 including documents, photographs, videos, electronic mail, search history and other relevant live and  
 233 deleted user information.

234 I also know that such devices can be used to communicate and share information with others and  
 235 that data can be transferred between various devices. I know such information may show evidence of  
 236 current, on-going, future, and past criminal activity. Such information can be used to identify electronic  
 237 records, witnesses, co-conspirators and attempts to hide criminal activity. It can also be used to establish  
 238 a timeline of criminal activity including preplanning, execution, and post event information.

239 I also know that data from these devices can often include user attribution data that can identify  
 240 the person(s) who sent, received, created, viewed, modified, or otherwise had control over particular  
 241 content.

242 I also know that some portable and vehicle mounted devices capture and retain geo-location data  
 243 such as GPS and may capture and store data from mobile devices that are connected wirelessly or by  
 244 cables. I know that this information can be used to associate a particular user and include or exclude them  
 245 from a particular geographic location on a particular date and time.

246 I also know that if these items are not seized and isolated from network connectivity in a timely  
 247 manner, evidence may be destroyed, transferred, encrypted, modified, or otherwise lost forever.

248 For these reasons, I believe probable cause exists to seize and examine all digital storage devices  
 249 and related accessories at the location described.

250

REMOVAL OF DATA STORAGE DEVICES

251 I know that a forensic image or forensic extraction is an exact physical copy of the user data  
 252 found on the storage media. A forensic image or forensic extraction captures data on the GORD media  
 253 without viewing or changing the user data in any way. Absent unusual circumstances, it is essential that a  
 254 forensic image or forensic extraction be obtained prior to conducting any search of data for information  
 255 GORD to seizure pursuant to the warrant. I also know that during the search of the premises it is not  
 256 always possible to create a forensic image of or search digital devices or media for data for a number of  
 257 reasons, including the following:

- 258 1. Searching digital devices can be a highly technical process that requires specific expertise and  
 259 specialized equipment. Because there are so many different types of digital devices and software  
 260 in use today, it is difficult to anticipate all of the necessary technical manuals, specialized  
 261 equipment, and specific expertise necessary to conduct a thorough search of the media to ensure  
 262 that the data will be preserved and evaluated in a useful manner.
- 263 2. Searching digital devices can require the use of precise, validated procedures designed to  
 264 maintain the integrity of the evidence and to recover latent data not readily apparent to the casual  
 265 user. The recovery of such data may require the use of special software and procedures, such as  
 266 those used in a law enforcement laboratory.
- 267 3. The volume of data stored on many digital devices is typically so large that it will be highly  
 268 impractical to search for data during the execution of the physical search of the premises. Storage  
 269 devices capable of storing several terabytes of data are now commonplace in desktop computers.  
 270 It can take several hours, or even days, to image a single drive. The larger the drive, the longer it  
 271 takes. Depending on the number and size of the devices, the length of time that agents must  
 272 remain on site to image and examine digital devices can become impractical.

273

INVENTORY AND RETURN

274 A list of all items seized under the authority of this search warrant will be left at the searched  
275 location along with the service copy of the search warrant. A copy of the list will also be provided to the  
276 Court.

With respect to the seizure of electronic storage media or the seizure or imaging of electronically stored information, we respectfully request the search warrant authorize a forensic search and seizure of such digital material.

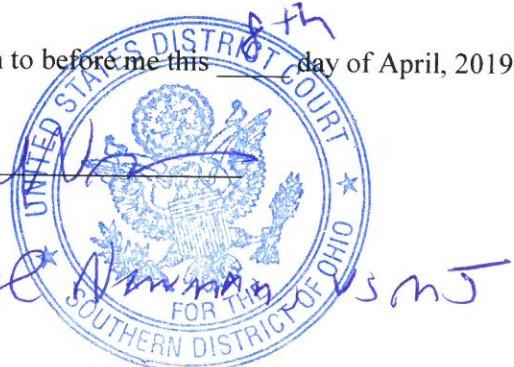
280 CONCLUSION

Based upon the aforementioned information, I respectfully submit there is probable cause to believe evidence, fruits, and instrumentalities of the criminal offenses listed in Attachment C may be located in the office location described in Attachment A. I, therefore, respectfully request the attached warrants be issued authorizing the search and seizure of the items listed in Attachment B.

Respectfully submitted,

Fredrick J. Seitz  
SPECIAL AGENT FREDERICK J. SEITZ IV  
AIR FORCE OFFICE OF SPECIAL  
INVESTIGATIONS

Subscribed and sworn to before me this  day of April, 2019.



**ATTACHMENT A**

**PLACE TO BE SEARCHED**

Based upon the above-mentioned information, I believe there to be sufficient probable cause to search GORD's government office/assigned cubicle located at Building 5, Area B, Room 5P17, WPAFB, OH.

Based on the above-mentioned information, I also believe there to be sufficient probably cause to search all locked/unlocked containers such as desks, drawers, hutches and government furniture in GORD's government office.

Based upon the above-mentioned information, I believe there to be sufficient probable cause to search all electronic media, including, but not limited to, the third electronic hard drive, used by GORD in performance of his official duties. Based on the above information, I believe there to be sufficient probable cause to seize the items listed in Attachment B and perform tasks necessary to be able to extract, forensically image and conduct a search of those items and images.

**ATTACHMENT B**

**PARTICULAR THINGS TO BE SEIZED**

Items of evidence to be Seized and Searched within GORD's government office/assigned cubicle located at Building 5, Area B, Room 5P17, WPAFB, OH, include:

- a. Non-digital (hard) documents including but not limited to files, paper records, and/or accountings;
- b. All tower computers, laptop computers, tablet computers, and any related digital storage media;
- c. All removable storage media, including hard disc drives, solid state drives (including the third hard drive assigned to GORD, live random access memory (RAM), wireless storage devices, USB flash storage devices, media cards (e.g. Compact Flash cards, Secure Digital cards, Micro Secure Digital cards), optical discs (e.g. CD's, DVD's, and Blue-ray discs), and any other device capable of storing digital data;
- d. All mobile devices, tablets, pocket computers, cellular telephones and any other portable mobile device, Subscriber Identity Modules (SIM cards), removable media cards, and related digital storage media;
- e. All navigation devices, such as portable GPS (Global Positioning System) navigation devices, vehicle navigation systems, Infotainment systems, and other devices that may contain geo-location data and user information;
- f. All digital cameras, digital audio recording devices, digital video cameras, digital video recording systems (DVR), smart speakers, removable media cards, hard drive discs, and related digital storage media;
- g. Any associated power cords, power supplies, cables, adapters, dongles, keys, software, manuals, routers, modems, wireless connections and connected device network information (e.g. Service Set Identifiers, Media Access Control addresses, TCP/IP), or any other items or information that may be necessary for access, allow proper operation, examination and analysis of the items seized; and
- h. All evidence of user attribution including accounts, e-mail accounts, passwords, PIN codes, patterns, account names, user names, screen names, remote data storage, or any other evidence that may demonstrate attribution to a particular user or users.

All such electronic seized evidence may be temporarily accessed for determining user attribution and to isolate it from network access or connectivity to prevent user data from being modified, deleted, or accessed.

Once such items of evidence are seized and rendered isolated, all such evidence will be searched for physical evidence such as live and deleted digital data, any hard/paper records, and any electronic records contained on such evidence

**ATTACHMENT C**

**FEDERAL CITATIONS**

1. 18 USC 1384, Prostitution Near Military and Naval Establishments - Within such reasonable distance of any military or naval camp, station, fort, post, yard, base, cantonment, training or mobilization place as the Secretary of the Army, the Secretary of the Navy, the Secretary of the Air Force, or any two or all of them shall determine to be needful to the efficiency, health, and welfare of the Army, the Navy, or the Air Force, and shall designate and publish in general orders or bulletins, whoever engages in prostitution or aids or abets prostitution or procures or solicits for purposes of prostitution, or keeps or sets up a house of ill fame, brothel, or bawdy house, or receives any person for purposes of lewdness, assignation, or prostitution into any vehicle, conveyance, place, structure, or building, or permits any person to remain for the purpose of lewdness, assignation, or prostitution in any vehicle, conveyance, place, structure, or building or leases or rents or contracts to lease or rent any vehicle, conveyance, place, structure or building, or part thereof, knowing or with good reason to know that it is intended to be used for any of the purposes herein prohibited shall be fined under this title or imprisoned not more than one year, or both.
2. 18 USC 287, False, Fictitious or Fraudulent Claims - Whoever makes or presents to any person or officer in the civil, military, or naval service of the United States, or to any department or agency thereof, any claim upon or against the United States, or any department or agency thereof, knowing such claim to be false, fictitious, or fraudulent, shall be imprisoned not more than five years and shall be subject to a fine in the amount provided in this title.
3. 18 USC 641, Embezzlement/Misuse of Government Property - Whoever embezzles, steals, purloins, or knowingly converts to his use or the use of another, or without authority, sells, conveys or disposes of any record, voucher, money, or thing of value of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof; or whoever receives, conceals, or retains the same with intent to convert it to his use or gain, knowing it to have been embezzled, stolen, purloined or converted.
4. 18 USC 1001, False Statements - (a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—
  - (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
  - (2) makes any materially false, fictitious, or fraudulent statement or representation; or
  - (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;
5. 18 USC 872, Extortion of Officers or Employees of the United States - Whoever, being an officer, or employee of the United States or any department or agency thereof, or representing himself to be or assuming to act as such, under color or pretense of office or employment commits or attempts an act of extortion
6. 18 USC Sec 7 & 13 which assimilate ORC 2927.12, Ethnic intimidation - 2927.12

(A) No person shall violate section 2903.21, 2903.22, 2909.06, or 2909.07, or division (A)(3), (4), or (5) of section 2917.21 of the Revised Code by reason of the race, color, religion, or national origin of another person or group of persons.

ORC 2903.21, Aggravated Menacing - (A) No person shall knowingly cause another to believe that the offender will cause serious physical harm to the person or property of the other person, the other person's unborn, or a member of the other person's immediate family. In addition to any other basis for the other person's belief that the offender will cause serious physical harm to the person or property of the other person, the other person's unborn, or a member of the other person's immediate family, the other person's belief may be based on words or conduct of the offender that are directed at or identify a corporation, association, or other organization that employs the other person or to which the other person belongs.